

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ASSOCIATED INDUSTRIES INSURANCE
COMPANY, INC.,

Civ. No. 1:21-cv-03624-LGS

Plaintiff,

-against-

WACHTEL MISSRY LLP and HOWARD
KLEINHENDLER,

Defendants.

**PARTIES JOINT SUBMISSION IN ACCORDANCE WITH THE COURT'S ORDERS
DATED OCTOBER 6, 2022 AND OCTOBER 11, 2022**

WHEREAS, on October 6, 2022, the Court entered an Order [dkt. 77], in which the Court ORDERED that the parties' recent letters [dkts. 68-69, 71, 72, and 84] are construed as cross-motions for summary judgment on Defendants' affirmative defenses;

WHEREAS, the Court further ORDERED that, no later than October 14, 2022, the parties shall jointly file all communications between Plaintiff and Defendants referenced in the parties' above-mentioned filings or otherwise pertaining to the resolution of the motions;

WHEREAS, on October 11, 2022, the Court entered a further ORDER [dkt. 80] extending the deadline for the parties' joint submission to November 4, 2022;

NOW, THEREFORE, Plaintiff, Associated Industries Insurance Company, Inc., and Defendants, Wachtel Missry LLP and Howard Kleinhendler, jointly submit the following materials in support of their cross-motions for summary judgment:

Exhibit No.	Bates No.	Document Date
1	AIIC01849-68	8/21/2019
2	AIIC01871-72	8/22/2019
3	AIIC01874-75	8/22/2019
4	AIIC01904-05	9/20/2019

Exhibit No.	Bates No.	Document Date
5	AIIC10404-06	12/31/2019
6	AIIC11432-37	1/8/2020
7	AIIC10131-33	2/7/2020
8	AIIC11849-51	2/7/2020
9	AIIC08744	2/13/2020
10	AIIC09139	2/20/2020
11	AIIC06338-39	2/25/2020
12	AIIC06346	2/26/2020
13	AIIC07577	2/26/2020
14	AIIC07331-32	3/1/2020
15	AIIC06341-42	3/2/2020
16	AIIC06271-72	4/27/2020
17	AIIC06210-11	5/21/2020
18	AIIC02939	6/8/2020
19	AIIC06213-15	6/9/2020
20	AIIC11942-44	6/9/2020
21	AIIC02582-91	6/19/2020
22	AIIC02622-23	6/19/2020
23	AIIC00703-13	10/5/2020
24	AIIC06377-83	12/11/2020
25	AIIC06203-05	1/17/2021
26	AIIC06348	2/6/2021
27	AIIC08750	2/11/2021
28	AIIC01783	2/24/2021
29	AIIC03392-99	4/20/2021
30	AIIC02628	5/3/2021
31	AIIC07256-58	5/6/2021
32	AIIC09468-69	9/9/2021
33	AIIC12193-200	

Dated: November 4, 2022

Respectfully submitted,

/s/ *Kim Hoyt Sperduto*
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